

1 **SO. CAL. EQUAL ACCESS GROUP**

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10 Attorneys for Plaintiff
11 MICHAEL RHAMBO

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MICHAEL RHAMBO,

15 Plaintiff,

16 vs.

17 HARDWARE FACTORY STORE, INC.;
18 NIKITA BETTYE KROUT, AS
19 TRUSTEE OF THE KROUT
20 REVOCABLE TRUST; and DOES 1 to
21 10,

22 Defendants.

23 **Case No.: 2:24-cv-02174-JLS (DFMx)**

24 **NOTICE OF VOLUNTARY
25 DISMISSAL OF ENTIRE ACTION
WITH PREJUDICE**

26 **PLEASE TAKE NOTICE** that Plaintiff MICHAEL RHAMBO (“Plaintiff”)
27 pursuant to Federal Rule of Civil Procedure Rule 41(a)(1) hereby voluntarily dismisses
28 the entire action *with* prejudice pursuant to Federal Rule of Civil Procedure Rule 41(a)(1)
which provides in relevant part:

29 (a) **Voluntary Dismissal.**

30 (1) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and 66
31 and any applicable federal statute, the plaintiff may dismiss an action
32 without a court order by filing:

1 (i) A notice of dismissal before the opposing party serves either an
2 answer or a motion for summary judgment.

3 None of the Defendants has either answered Plaintiff's Complaint, or filed a motion for
4 summary judgment. Accordingly, this matter may be dismissed without an Order of the
5 Court.

6 DATED: July 15, 2024

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10 By: /s/ *Jason J. Kim*
11 Jason J. Kim, Esq.
12 Attorneys for Plaintiff
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